

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 05-10001-WGY

UNITED STATES

v.

GREGORY R. WRIGHT

FURTHER AFFIDAVIT OF CHARLES W. RANKIN

Being duly sworn, Charles W. Rankin states:

1. I submit this further affidavit on the question of whether the area of 1222 Blue Hill Avenue, Boston, could legitimately be considered a high crime area as of the date of this incident on November 8, 2004.
2. At the hearing on July 18, 2005, Officer Mark Bordley testified that members of the Youth Violence Strike Force attended bi-weekly meetings in October and November 2004 and reviewed maps and other reports that identified recent crimes and hot spots. During the course of the hearing, the government agreed to obtain the two reports that preceded the November 8 encounter with the defendant. On July 20, 2005, I received an affidavit of ATF agent Rudnicki regarding the availability of those reports, along with the two most recent reports. The Rudnicki affidavit and the reports are attached to this affidavit as Exhibit 1. I have reviewed those reports, from August 2004. Each report identifies "hot spots," which is consistent with Officer Bordley's testimony. Neither report supports the conclusion that

the area around 1222 Blue Hill Avenue was a high crime area.

3. For the period of August 4 to August 16, the closest hot spot is described as the Blue Hill/Columbia Area, depicted on page 11 of Exhibit 1. That location, in the vicinity of 600 Blue Hill Avenue, is 1.5 miles away from 1222 Blue Hill Avenue, according to Goggle maps. See Exhibit 2.
4. For the period of August 17 to August 30, the closest hot spot is described as Geneva/Normandy/BHA Area, depicted on page 25 of Exhibit 1. That location, in the vicinity of 400 Blue Hill Avenue, is 2.1 miles away from 1222 Blue Hill Avenue, according to Goggle maps. See Exhibit 3.

Signed under the penalty of perjury on July 27, 2005.

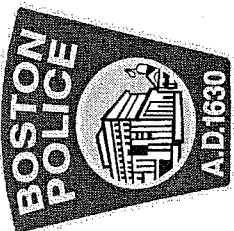
/s/

Charles W. Rankin

ATTACHMENT A


EXHIBIT 1 TO RANKIN AFFIDAVIT

001



BostonPolice
D E P A R T M E N T

Office of Research and Evaluation

Armed Violent Crime

*Year-to-date,
August 4th – August 16th*

Gang Meeting

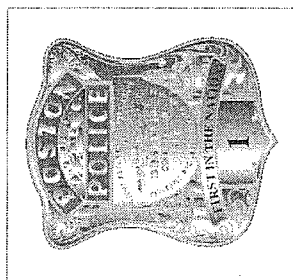
8-17-04

Year-to-date Violent Crime Stats

January 1 – August 16, 2003 v. 2004

	January - August 16, 2003 vs. 2004		
Crime Category	2003	2004	% Chg.
Homicide	26	45	73%
Robbery & Attempted	1,689	1,459	-14%
Aggravated Assault	2,541	2,486	-2%
Total	4,256	3,990	-6%

Incidents Involving a Firearm			
	January - August 16, 2003 vs. 2004		
Crime Category	2003	2004	% Chg.
Homicide	14	34	143%
Robbery & Attempted	485	292	-40%
Aggravated Assault	279	195	-30%
Total	778	521	-33%



Year-to-Date Shootings 2003 vs. 2004

All Cases

January 1st - August 9th

Crime Category	2003	2004	# chg.	% chg.
Homicides with a Gun	13	33	20	154%
Non-Fatal Shootings	85	136	51	60%
All Shootings	98	169	71	72%
Total Victims	98	169	71	72%



BostonPolice

D E P A R T M E N T

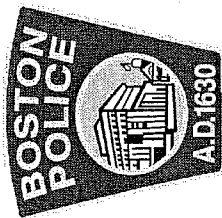
Office of Research and Evaluation



Armed Violent Crime

August 4th – August 16th

005



*Armed Incidents:
August 4th – August 16th*

103 Total Armed Incidents

5 Homicides

-All with a firearm

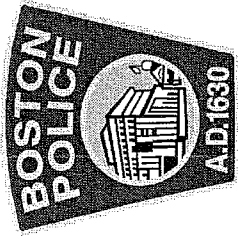
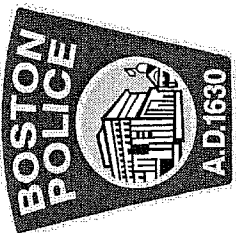
45 Robberies

53% with a firearm, 27% with a knife, 20% with other

53 Assaults*

36% with a knife, 34% with other, 30% with a firearm

**Non-Domestic Assaults*



Armed Incidents Over the Past 6 Weeks

5-6 Weeks Ago

3-4 Weeks Ago

Past Two Weeks

7/7 - 7/20

125 Incidents

5 Homicides

45 Robberies

75 Assaults

7/21 - 8/3

162 Incidents

4 Homicides

58 Robberies

100 Assaults

8/4 - 8/16

103 Incidents

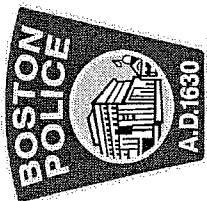
5 Homicides

45 Robberies

53 Assaults

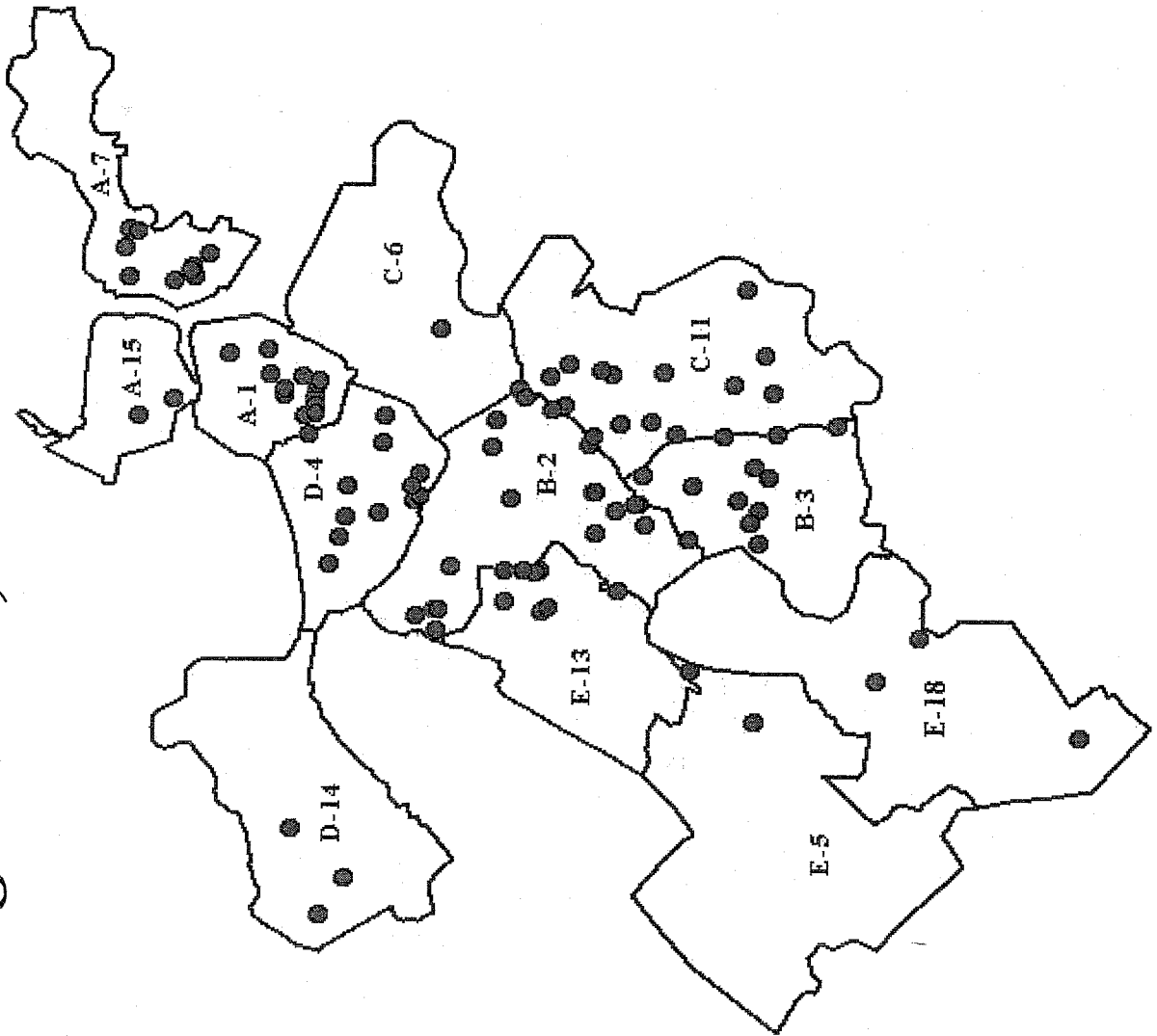
007

**Non-Domestic Assaults*

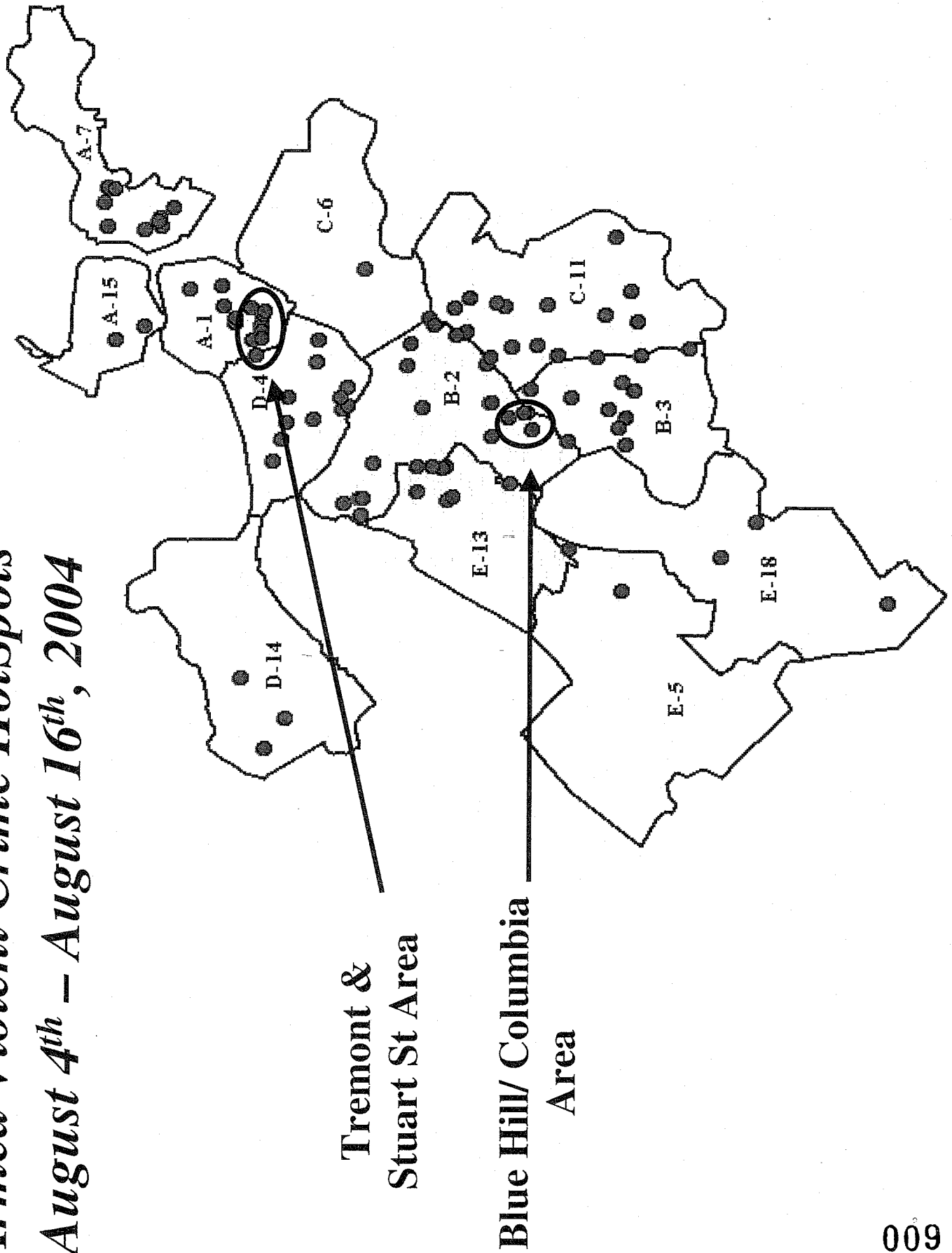


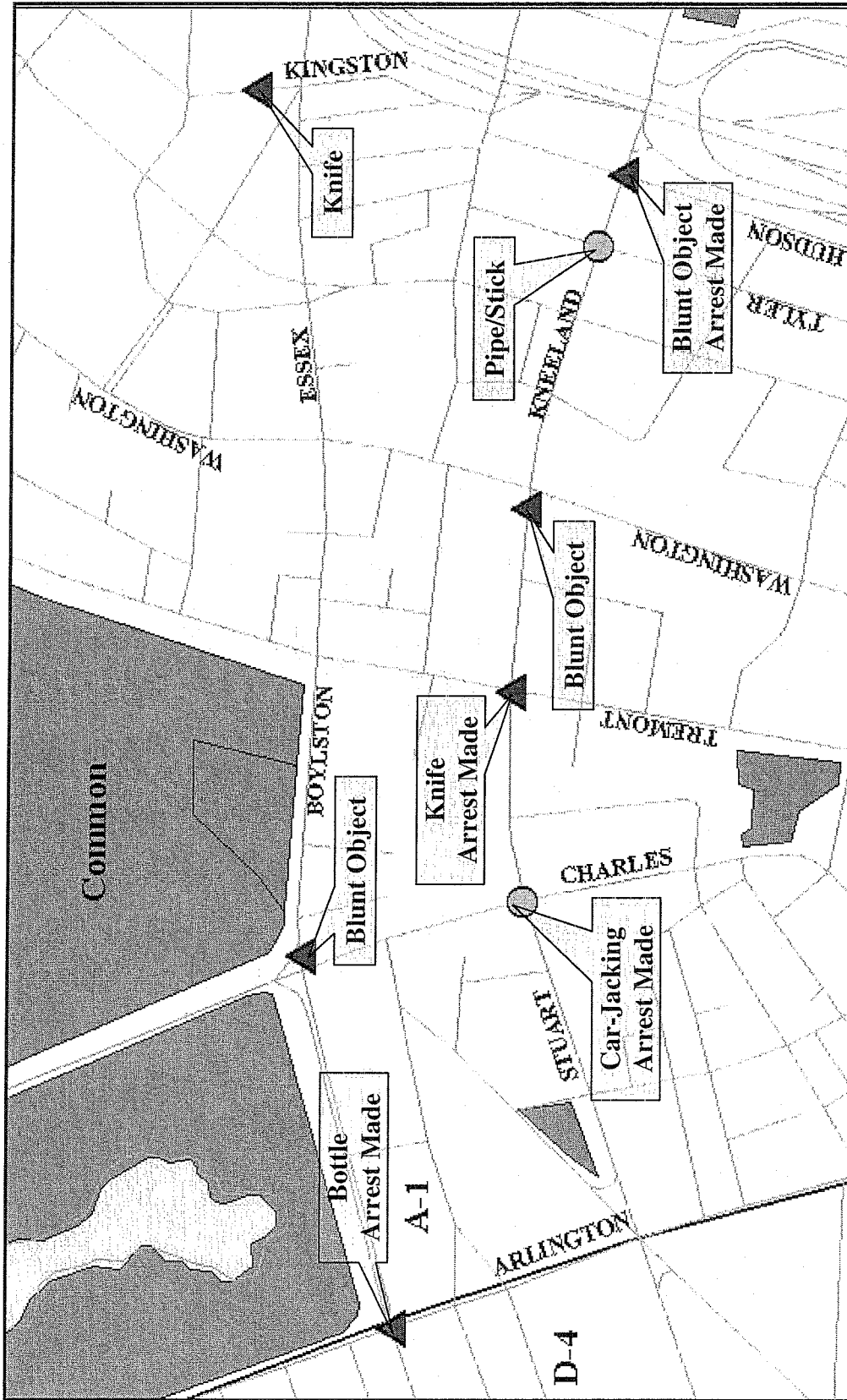
Armed Violent Crime *August 4th – August 16th, 2004*

District	# of Incidents
B2	19
C11	17
A1/A15	14
D4	12
B3	12
A7	10
E13	8
E18	3
D14	3
C6	3
E5	2
Total	103



***Armed Violent Crime HotSpots
August 4th – August 16th, 2004***





2 Robberies

6 Assaults

4 Arrests

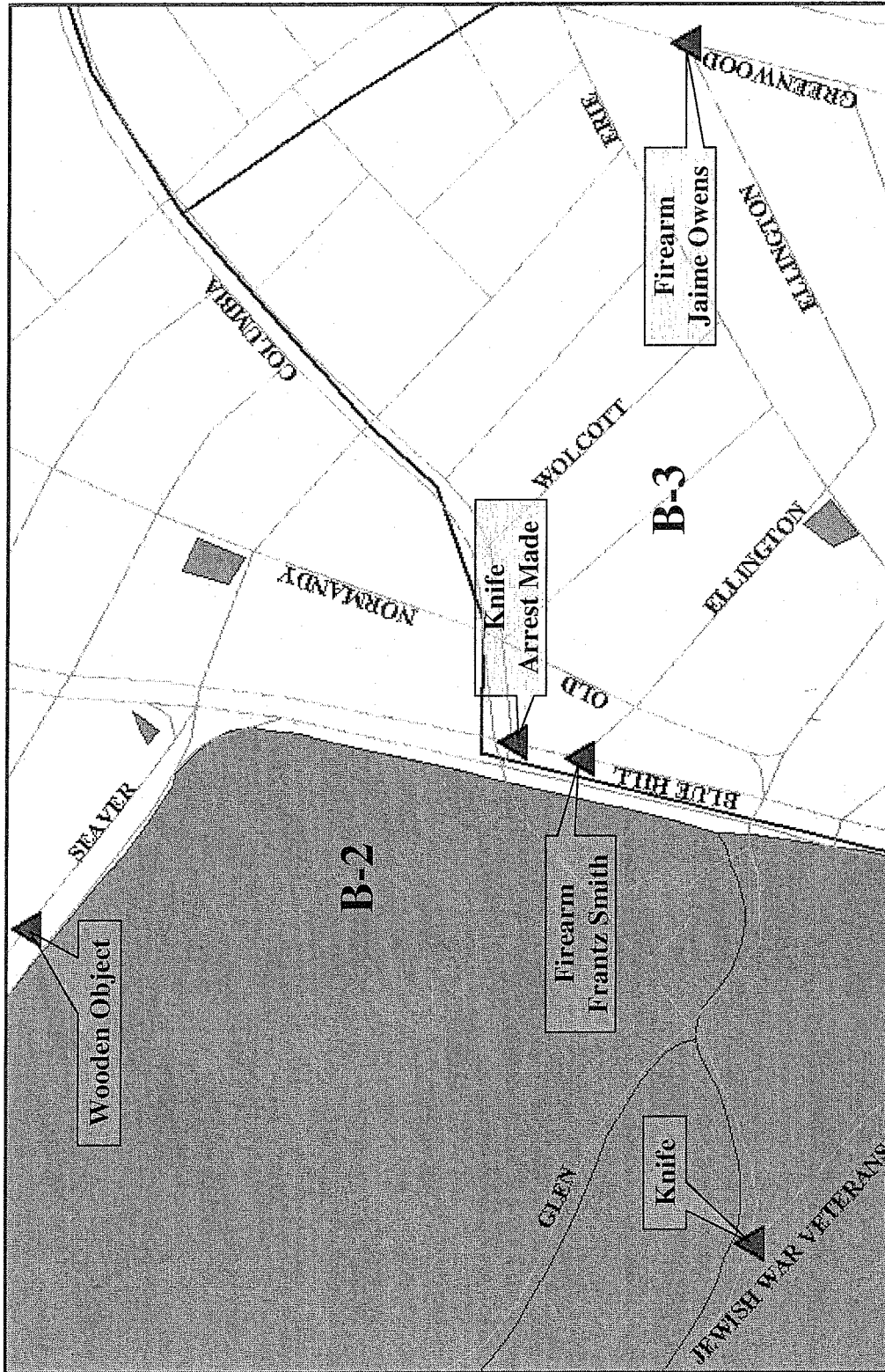
- One Robbery
- Three Assault

Armed Incidents:

August 4th – August 16th

Tremont/Stuart Street Area

D-4 / A-1



Armed Incidents: 5 Assaults: 1 Arrest

August 4th – August 16th

Blue Hill/Columbia Area

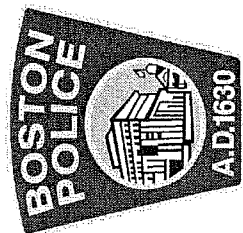
B-2 / B-3

-2 with Firearm

-1 Non-Fatal Shootings

- 8/4 Jaime Owens

- 8/9 Frantz Smith

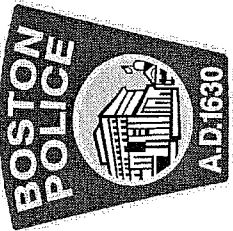


BostonPolice
D E P A R T M E N T

Office of Research and Evaluation

Questions??

ATTACHMENT B



BostonPolice
D E P A R T M E N T

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Armed Violent Crime
August 17th – August 30th, 2004

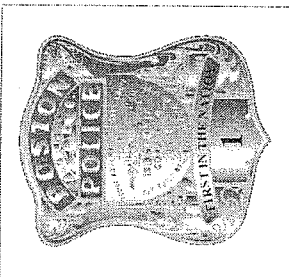
Gang Intelligence Meeting
8-31-04

Year-to-date Violent Crime Stats

January 1 – August 30, 2003 v. 2004

	January - August 30, 2003 vs. 2004		
Crime Category	2003	2004	% Chg.
Homicide	28	43	54%
Robbery & Attempted	1,801	1,554	-14%
Aggravated Assault (Non-Dom.)	1,903	1,836	-4%
Total	3,732	3,433	-8%

Incidents Involving a Firearm			
	January - August 30, 2003 vs. 2004		
Crime Category	2003	2004	% Chg.
Homicide	15	35	133%
Robbery & Attempted	511	438	-14%
Aggravated Assault (Non-Dom.)	273	315	15%
Total	799	788	-1%



Year-to-Date Shootings 2003 vs. 2004

All Cases

January 1st - August 30th

Crime Category	2003	2004	# chg.	% chg.
Homicides with a Gun	15	35	20	133%
Non-Fatal Shootings	102	146	44	43%
All Shootings	117	181	64	55%

Operation Neighborhood

Shield

8/7/04



2004 Shootings by 2 week period	
8/11 – 8/24/04	6
7/28 – 8/10/04	20
7/14 – 7/27/04	17
6/30 – 7/13/04	17
6/16 – 6/29/04	16
6/2 – 6/15/04	14
5/19 – 6/1/04	6
5/6 – 5/18/04	7
4/21 – 5/5/04	16
4/7 – 4/20/04	6
3/24 – 4/6/04	8
3/10 – 3/23/04	3
2/25 – 3/9/04	2
2/11 – 2/24/04	10
1/28 – 2/10/04	7
1/14 – 1/27/04	2
1/1 – 1/13/04	9

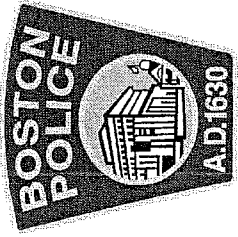
(8/25 – 8/30) – 6 days:

5 Shootings (including one
homicide)

B3: 3

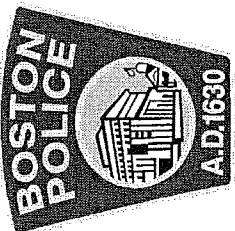
B2: 1

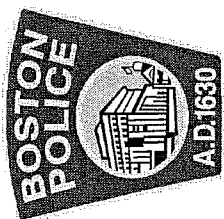
A7: 1



Armed Violent Crime

August 17th – August 30th





*Armed Incidents:
August 17th – August 30th*

119 Total Armed Incidents

1 Homicide

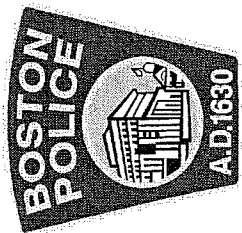
46 Robberies

52% with a firearm, 28% with a knife, 20% with other

*72 Assaults**

33% with a knife, 40% with other, 26% with a firearm

**Non-Domestic Assaults*



Armed Incidents Over the Past 6 Weeks

5-6 Weeks Ago

3-4 Weeks Ago

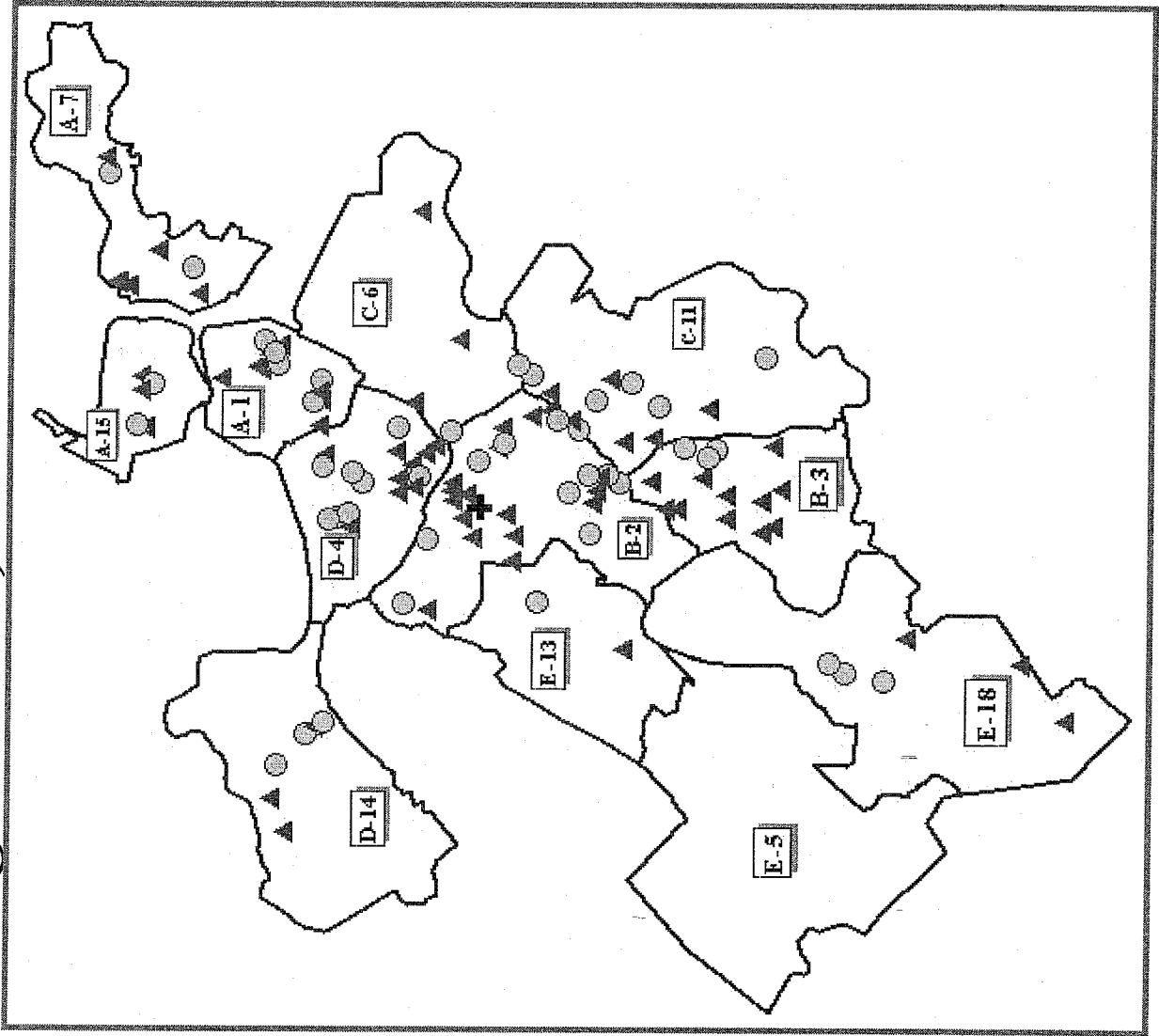
Past Two Weeks

<u>7/21 - 8/3</u>	<u>8/4 - 8/16</u>	<u>8/17 - 8/30</u>
162 Incidents	103 Incidents	119 Incidents
4 Homicides	5 Homicides	1 Homicide
58 Robberies	45 Robberies	46 Robberies
100 Assaults	53 Assaults	72 Assaults

**Non-Domestic Assaults*



Armed Violent Crime August 17th – August 30th, 2004



District	Homicide	Robbery	Assaults*	Total
B2	1	11	18	30
D4	0	8	9	17
B3	0	3	11	14
A1	0	5	8	13
C11	0	5	6	11
A7	0	2	6	8
C6	0	3	3	6
D14	0	3	3	6
E18	0	3	3	6
A15	0	2	3	5
E13	0	1	2	3
Total	1	46	72	119

*Non-Domestic Assaults Only

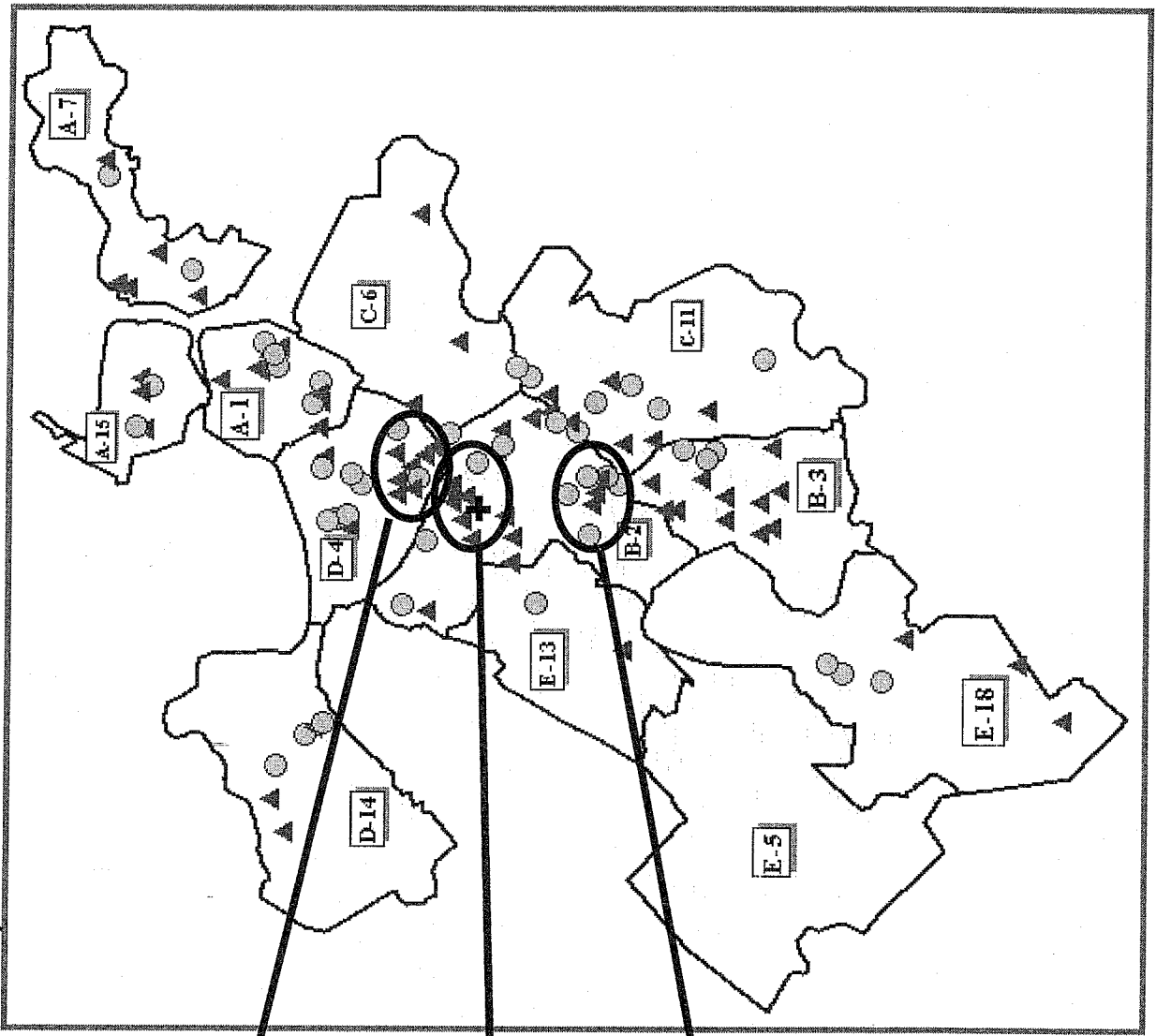
25% of the incidents occurred in B2

14% occurred in D4

12% in B3

021

Armed Violent Crime Hot Spots August 17th – August 30th, 2004

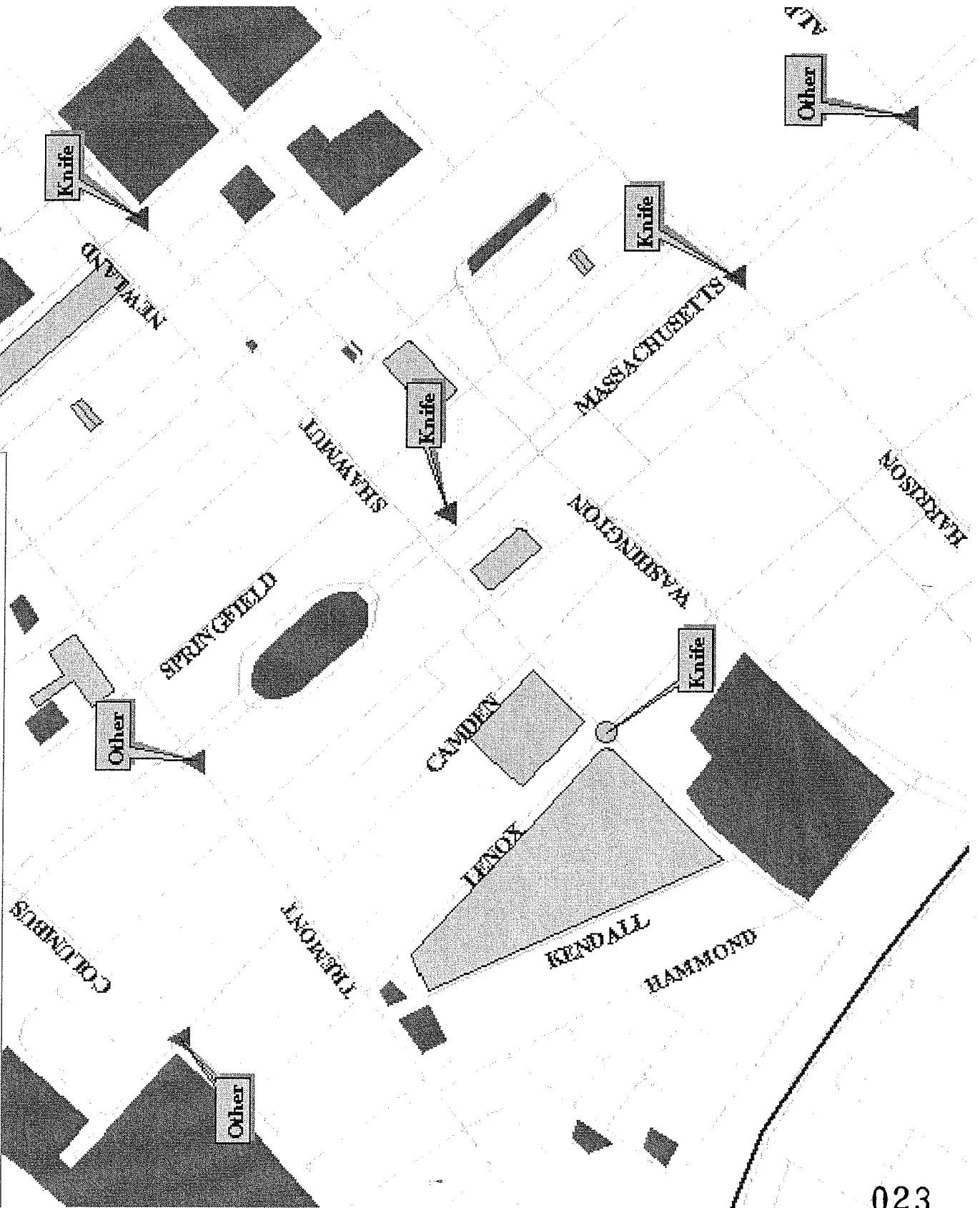


D4: Lenox/Mass. Ave/Tremont Area
6 Aggravated Assaults and 1 Armed
Robbery

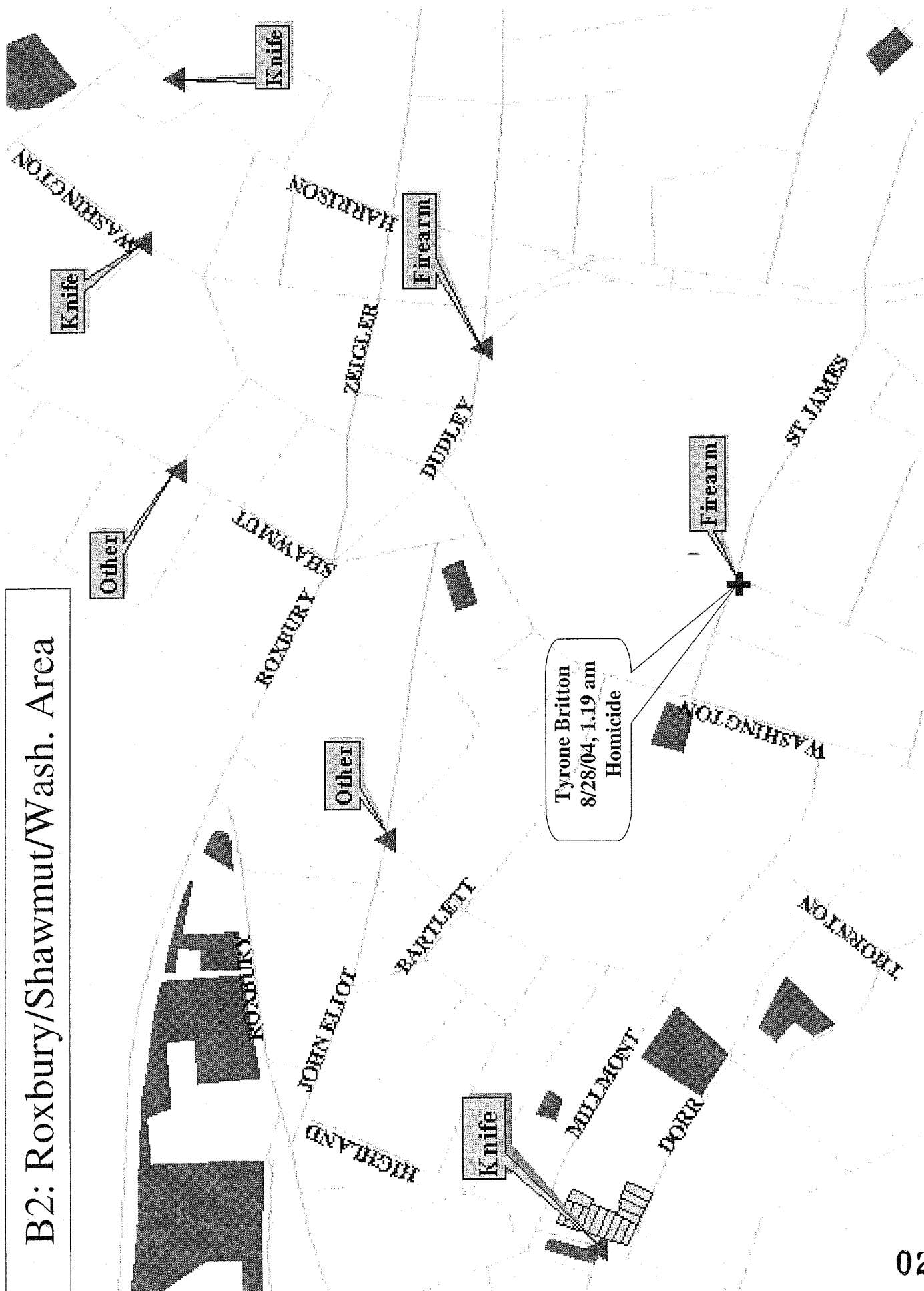
B2: Roxbury/Shawmut/Wash. Area
6 Aggravated Assaults and 1
Homicide

B2: Geneva/Normandy/BHA Area
4 Armed robberies (Including One
Car-jacking) and 3 Assaults

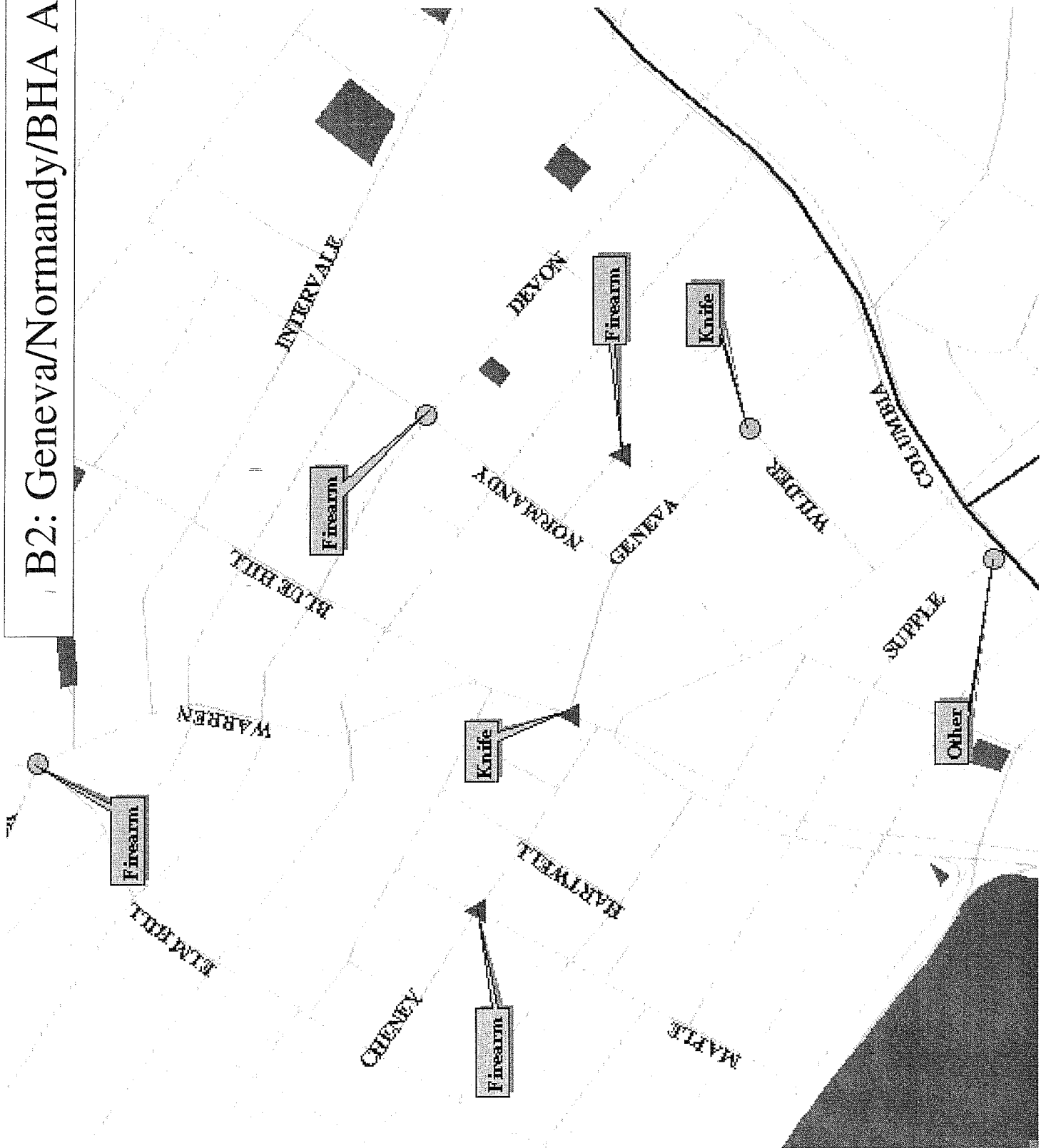
D4: Lenox/Mass. Ave/Tremont Area

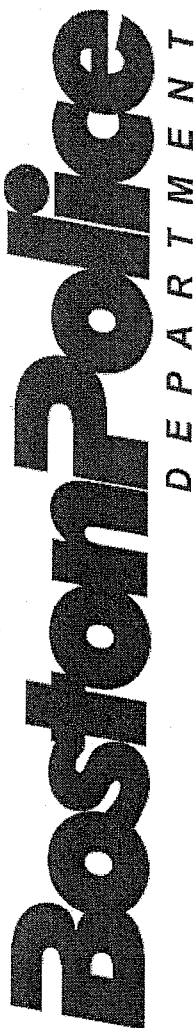


B2: Roxbury/Shawmut/Wash. Area



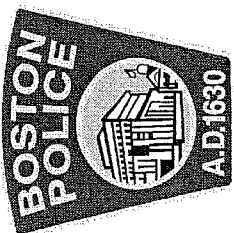
B2: Geneva/Normandy/BHA Area





Office of Research and Evaluation

Questions??



ATTACHMENT C

AFFIDAVIT OF SPECIAL AGENT LISA RUDNICKI

I, Lisa Rudnicki, under the pains and penalties of perjury, do hereby depose and state as follows:

1. On July 18th, 2005, in connection with the case entitled United States v. Gregory Wright, and at the direction of the United States Attorney's Office, I contacted Officer Earl Perkins of the Intelligence Division of the Boston Police Department ("BPD"). As a result of this conversation, I learned the following:

2. In 2004, the BPD would hold biweekly meetings called gang meetings. These meetings were attended by members of several BPD units and law enforcement agencies, including the BPD Youth Violence Task Force, the BPD Drug Control Unit, the Massachusetts Probation Department, and the Suffolk County District Attorney's Office.

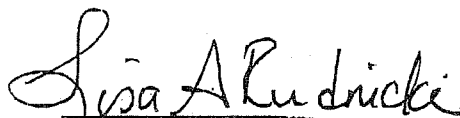
3. At these meetings, attendees received statistics and maps regarding firearm arrests, gun recoveries, shootings, and other violent crimes that had occurred in Boston over the previous two weeks. Based upon this description, it is my understanding that these meetings were those referred to by BPD Officer Mark Bordley in his testimony on July 18, 2005 during the suppression hearing of this case.

4. The format and procedures used during the gang meetings were revamped between August 31, 2004, and November 17, 2004.

Thus, no meetings took place during that time and there are no statistics and maps available for that time period.

5. Prior to November 17, 2004, the most recent gang meetings occurred on August 17 and August 31. I was able to retrieve the statistics and maps that were distributed at both of those meetings. Copies of those documents are included with the Government's filing in this case as Attachments A and B.

Signed under the pains and penalties of perjury on July 20, 2005,



LISA A. RUDNICKI

Special Agent

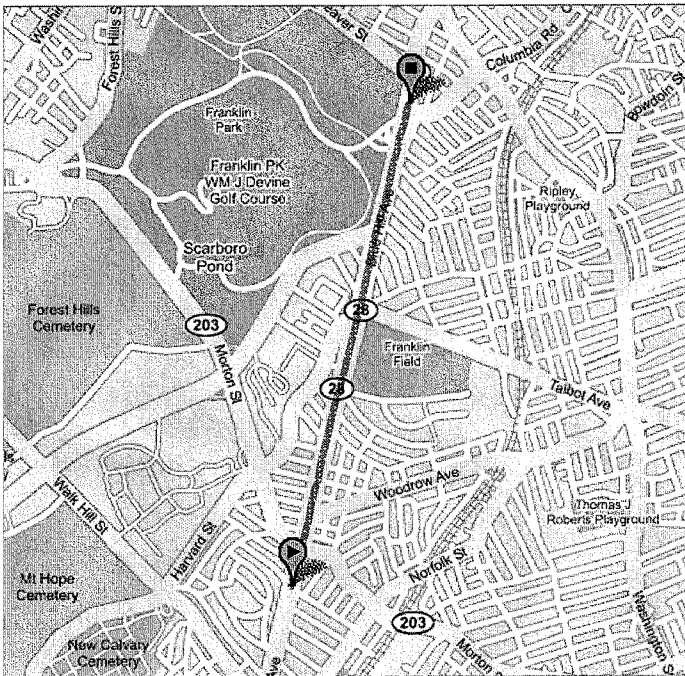
Bureau of Alcohol, Tobacco, and Firearms



Directions

Start address 1222 blue hill avenue, boston, ma

End address 600 Blue Hill Ave, Dorchester, MA 02121



Start address: 1222 Blue Hill Ave
Mattapan, MA 02126

End address: 600 Blue Hill Ave
Dorchester, MA 02121

Distance: 1.5 mi (about 2 mins)

1. Head from **Blue Hill Ave** - go 1.5 mi

These directions are for planning purposes only. You may find that construction projects, traffic, or other events may cause road conditions to differ from the map results.

Map data ©2005 NAVTEQ™ Tele Atlas

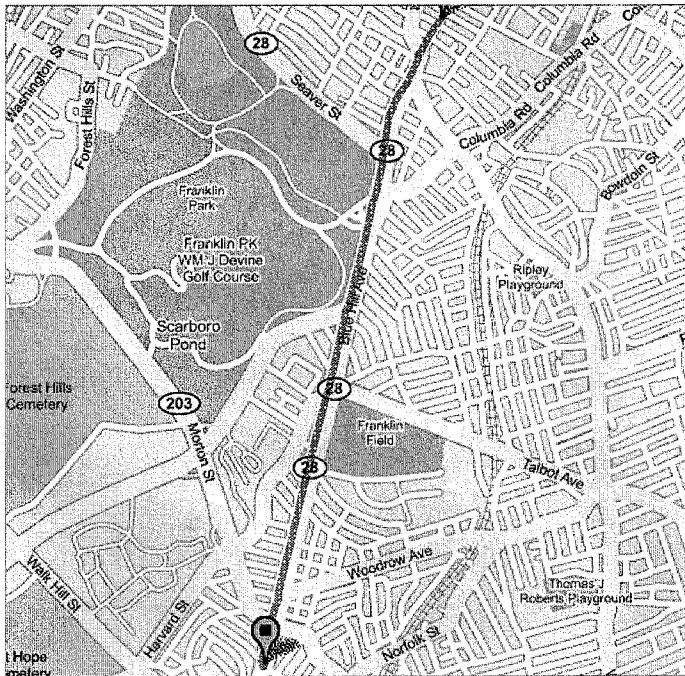
EXHIBIT 2 TO RANKIN AFFIDAVIT



Directions

Start address 400 blue hill avenue, boston, ma

End address 1222 Blue Hill Ave, Dorchester, MA 02121



Start address: 400 Blue Hill Ave
Dorchester, MA 02121

End address: 1222 Blue Hill Ave
Mattapan, MA 02126

Distance: 2.1 mi (about 3 mins)

1. Head **southwest** from **Blue Hill Ave** - go **2.1 mi**
2. Make a **U-turn** at **Blue Hill Ave** - go **0.0 mi**

These directions are for planning purposes only. You may find that construction projects, traffic, or other events may cause road conditions to differ from the map results.

Map data ©2005 NAVTEQ™ Tele Atlas

EXHIBIT 3 TO RANKIN AFFIDAVIT